

LAWRENCE A. ORGAN (SBN 175503)
NAVRUZ AVLONI (SBN 279556)
CIMONE A. NUNLEY (SBN 362915)
CALIFORNIA CIVIL RIGHTS LAW GROUP
332 San Anselmo Ave.
San Anselmo, California, 94960
Telephone: (415) 453-4740
Facsimile: (415) 785-7352
larry@civilrightsca.com
navruz@civilrightsca.com

J. BERNARD ALEXANDER (SBN 128307)
ALEXANDER KRAKOW + GLICK LLP
1900 Avenue of the Stars, Suite 900
Los Angeles, California 90067
Telephone: (310) 394-0888
Facsimile: (310) 394-0811
balexander@akgllp.com

Attorneys for Plaintiff
OWEN DIAZ

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DEMETRIC DI-AZ, OWEN DIAZ, and
LAMAR PATTERSON,

Plaintiffs,

v.

TESLA, INC. dba TESLA MOTORS, INC.;
CITISTAFF SOLUTIONS, INC.; WEST
VALLEY STAFFING GROUP;
CHARTWELL STAFFING SERVICES, INC.;
and DOES 1-50, inclusive,

Defendants.

Case No. 3:17-cv-06748-WHO

**PLAINTIFF'S ADMINISTRATIVE
MOTION TO FILE DOCUMENTS
UNDER SEAL IN SUPPORT OF
PLAINTIFF'S MOTIONS *IN LIMINE*
NOS. 1-6**

Date: May 11, 2020

Time: 10:00 a.m.

Courtroom: 2, 17th Floor

Judge: Hon. William H. Orrick

Trial Date: June 8, 2020

Complaint filed: October 16, 2017

MOTION

Pursuant to Local Rules 7-11 and 79-5, as well as Judge Orrick's Standing Order regarding administrative motions to seal, Plaintiff Owen Diaz respectfully requests an order sealing the physical copies in the Court's files of Exhibits 1 through 18 to the Supplemental Declaration of Cimone Nunley in Support of Plaintiff's Motions *in Limine* Nos. 1-6. This Motion is based on the Declaration of Cimone Nunley in support thereof, and the documents to be sealed are laid out below:

Document	Designating Party	Basis for Sealing
Exhibit 1: Deposition of Plaintiff Owen Diaz, Vol. I	Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit 2: TESLA-0000004 to TESLA-0000008	Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit 3: TESLA-0000732 to TESLA-0000734	Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit 4: NS000012 to NS000013	nextSource, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit 5: NS000136 to NS000137	nextSource, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit 6: TESLA-0000125 to TESLA-0000130	Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit 7: TESLA-0000702 to TESLA-0000703	Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit 8: TESLA-0000127 to TESLA-0000128	Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit 9: TESLA-0000664	Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit 10: TESLA-0000319	Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit 11: TESLA-0000320	Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit 12: TESLA-0000612	Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit 13: TESLA-0000336 to TESLA0000338	Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit 14: TESLA-0000505 to TESLA0000506	Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit 15: TESLA-0000557	Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).

Exhibit 16: TESLA-0000704 to TESLA-0000705	Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit 17: TESLA-0000708 to TESLA0000709	Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit 18: TESLA0000741 to TESLA-0000743	Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).

Publicizing these documents would violate the Protective Order entered in this case [Dkt. No. 50].

DATED: April 20, 2020

By: /s Lawrence Organ

Lawrence A. Organ, Esq.

Navruz Avloni, Esq.

J. Bernard Alexander, Esq.

Cimone A. Nunley, Esq.

Attorneys for Plaintiff

OWEN DIAZ